Statement of Basis of the Federal Operating Permit

Toyota Motor Manufacturing, Texas, Inc.

Site Name: Toyota Motor Manufacturing Texas Area Name: Toyota Vehicle Assembly Plant Physical Location: 1 Lone Star Pass Nearest City: San Antonio County: Bexar

> Permit Number: O2840 Project Type: Renewal

Standard Industrial Classification (SIC) Code: 3711 SIC Name: Motor Vehicles and Passenger Car Bodies

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected:

A compliance status; and

A list of available unit attribute forms.

Prepared on: August 17, 2017

Operating Permit Basis of Determination

Permit Area Process Description

The Toyota Motor Manufacturing Texas, Inc. (TMMTX) is a new vehicle light duty pickup and automobile assembly plant in San Antonio. The NSR /PSD construction permit and the federal operating permit cover two independent assembly plants which contain separate assembly line operations (Assembly Lines 1 and 2). This encompasses a multitude of processes, some of which have the potential to emit air emissions. These processes are grouped into the following categories: Plantwide Process Natural Gas Combustion (NGCOMB), Paint Shop Boilers (PSBOIL), Bulk Material Storage Tanks (BMST), Stamping Shop/Body Shop (SS/BS), Surface Coating System (SCS), Plastic Molding and painting (PLASPNT), Miscellaneous Metal Coatings (METCOAT), Miscellaneous Body Coatings (MSA), Miscellaneous Process Cleanings (PROCLEAN), Paint Repair (PNTRPR), Assembly Final Line (AFL) and Marshalling Yard (MARYARD).

<u>NGCOMB</u> units combust natural gas and provide heat for process curing ovens, heating, ventilation, air conditioning, fresh air makeup units, hot water heaters, VOC emission control devices and regenerative thermal oxidizers (RTOs).

<u>PSBOIL</u> includes boilers which combust natural gas (#2 distillate fuel as an emergency backup) and generate low-pressure steam necessary to operate paint shop equipment.

<u>BMST</u> includes above ground storage of materials integral to production of vehicles.

In the <u>SS/BS</u>, sheet metal components are resistance spot welded, MIG welded and grinded. Sealers and adhesives are also used as part of the process and may release small amounts of organic solvents. Emissions also occur from the combustion of natural gas to operate machinery.

In the <u>SCS</u> (E-coat, Primer Surfacer, and Topcoat Systems), the vehicle's surface is washed and coated using miscellaneous solvents and cleaners. This is further subdivided into the pre-phosphate washer, Phosphate system, dry sanding, E-Coat, Primer Surface System, Topcoat System and Dampener/Blackout unit. Each of these subdivisions emit VOC from the miscellaneous solvents, cleaners, and paints. VOC from flash-off areas and curing ovens are routed to regenerative thermal oxidizers for destruction (see NGCOMB); wet scrubbers control particulate matter (PM) from spray booths.

In the <u>PLASPNT</u>, interior parts and bumpers are injection molded. The parts are then coated in spray booths and subsequently sent to curing ovens. Some topcoat spray (basecoat/clearcoat) operations are conducted, as well. Wet scrubbers are an integral part of spray booth operations and an RTO controls curing oven emissions.

In the <u>METCOAT</u>, fuel tanks and small parts are coated in either paint booths or electrodeposition dip tanks, then cured in curing ovens. Wet scrubbers are an integral part of spray booth operations and an RTO controls curing oven emissions.

In the <u>MSA</u>, sealers, adhesives and cavity wax is applied. The area also operates an antichip paint booth, engine, hub and underbody wax application and curing oven for various materials.

In the <u>PROCLEAN</u>, vehicle body prep for painting, purging of paint lines, paint booth cleaning, wiping solvent disposed and general cleanup is conducted.

In the PNTRPR, paint defects, following assembly, are repaired in spot repair facilities (booths and ovens).

In <u>AFL</u>, the vehicle components (trim, chassis, powertrain) are assembled/merged and vehicle fluids are added. Emissions are from the following processes: vehicle fluids fill, A/C charge, vehicle glass installation, vehicle startup and roll test, and final repair and touchups.

In the <u>MARYARD</u>, vehicles receive any required touch up paint and then are washed and stored prior to off-site shipment by either railcar or carrier truck.

FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants VOC. HAPS		
	Major Pollutants	IVOL HAPS

Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - o Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - o Alternative Requirements
- Appendix A
 - Acronym list
- Appendix B
 - Copies of major NSR authorizations

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not

physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A.(iv) for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CSAPR (Cross-State Air Pollution Rule)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- 5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.

- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 15. Well cellars.
- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
- 18. Equipment used exclusively for the melting or application of wax.
- 19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
- 20. Shell core and shell mold manufacturing machines.
- 21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
- 22. Equipment used for inspection of metal products.
- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 25. Battery recharging areas.
- 26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-PNTREP	40 CFR Part 63, Subpart IIII	63IIII-PNTREP	UNIT TYPE = PROCESS (SURFACE COATING OF AUTOMOBILES AND LIGHT-DUTY TRUCKS) FUNCTIONALLY IDENTICAL REPLACEMENT [REG VII] = UNIT IS NOT FUNCTIONALLY IDENTICAL REPLACEMENT (DATE CONSTRUCTED/PLACED IN SERVICE = '92+') COMBINED ORGANIC HAP EMISSIONS FROM ELECTRODEPOSITION PRIMER, PRIMER-SURFACER, TOPCOAT, FINAL REPAIR, GLASS BONDING PRIMER AND GLASS BONDING ADHESIVE OPERATIONS PLUS ALL COATINGS AND THINNERS, EXCEPT FOR DEADENER MATERIALS AND FOR ADHESIVE AND SEALER MATERIALS NOT COMPONENTS OF GLASS BONDING SYSTEMS, USED IN COATING OPERATIONS.	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND THE BASIS OF DETERMINATION.
MS&ADEADENER	40 CFR Part 63, Subpart IIII	63IIII-DEADENER	UNIT TYPE = PROCESS (SURFACE COATING OF AUTOMOBILES AND LIGHT-DUTY TRUCKS) FUNCTIONALLY IDENTICAL REPLACEMENT [REG VII] = UNIT IS NOT FUNCTIONALLY IDENTICAL REPLACEMENT (DATE CONSTRUCTED/PLACED IN SERVICE = '92+') AVERAGE ORGANIC HAP EMISSIONS FROM ALL DEADENER MATERIALS.	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND THE BASIS OF DETERMINATION.
MS&AEXCGLASS	40 CFR Part 63, Subpart IIII	63IIII-EXCGLASS	UNIT TYPE = PROCESS (SURFACE COATING OF AUTOMOBILES AND LIGHT-DUTY TRUCKS) FUNCTIONALLY IDENTICAL REPLACEMENT [REG VII] = UNIT IS NOT FUNCTIONALLY IDENTICAL REPLACEMENT (DATE CONSTRUCTED/PLACED IN SERVICE = '92+') AVERAGE ORGANIC HAP EMISSIONS FROM ALL ADHESIVE AND SEALER MATERIALS OTHER THAN MATERIALS USED AS COMPONENTS OF GLASS BONDING SYSTEMS.	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND THE BASIS OF DETERMINATION.
MS&AGLASS	40 CFR Part 63, Subpart IIII	63IIII-GLASS	UNIT TYPE = PROCESS (SURFACE COATING OF AUTOMOBILES AND LIGHT-DUTY TRUCKS) FUNCTIONALLY IDENTICAL REPLACEMENT [REG VII] = UNIT IS NOT FUNCTIONALLY IDENTICAL REPLACEMENT (DATE CONSTRUCTED/PLACED IN SERVICE = '92+') COMBINED ORGANIC HAP EMISSIONS FROM ELECTRODEPOSITION PRIMER, PRIMER-SURFACER, TOPCOAT, FINAL REPAIR, GLASS BONDING PRIMER AND GLASS BONDING ADHESIVE OPERATIONS PLUS ALL COATINGS AND THINNERS, EXCEPT FOR DEADENER MATERIALS AND FOR ADHESIVE AND SEALER MATERIALS NOT COMPONENTS OF GLASS BONDING SYSTEMS.	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND THE BASIS OF DETERMINATION.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-PLASPNT	40 CFR Part 63, Subpart IIII	63IIII- PLASPNT	UNIT TYPE = PROCESS (SURFACE COATING OF AUTOMOBILES AND LIGHT-DUTY TRUCKS) FUNCTIONALLY IDENTICAL REPLACEMENT [REG VII] = UNIT IS NOT FUNCTIONALLY IDENTICAL REPLACEMENT (DATE CONSTRUCTED/PLACED IN SERVICE = '92+') COMBINED ORGANIC HAP EMISSIONS FROM ELECTRODEPOSITION PRIMER, PRIMER-SURFACER, TOPCOAT, FINAL REPAIR, GLASS BONDING PRIMER AND GLASS BONDING ADHESIVE OPERATIONS PLUS ALL COATINGS AND THINNERS, EXCEPT FOR DEADENER MATERIALS AND FOR ADHESIVE AND SEALER MATERIALS NOT COMPONENTS OF GLASS BONDING SYSTEMS, USED IN COATING OPERATIONS.	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND THE BASIS OF DETERMINATION.
GRP-PROCLEAN	40 CFR Part 63, Subpart IIII	63IIII- PROCLEAN	UNIT TYPE = PROCESS (SURFACE COATING OF AUTOMOBILES AND LIGHT-DUTY TRUCKS) FUNCTIONALLY IDENTICAL REPLACEMENT [REG VII] = UNIT IS NOT FUNCTIONALLY IDENTICAL REPLACEMENT (DATE CONSTRUCTED/PLACED IN SERVICE = '92+') COMBINED ORGANIC HAP EMISSIONS FROM ELECTRODEPOSITION PRIMER, PRIMER-SURFACER, TOPCOAT, FINAL REPAIR, GLASS BONDING PRIMER AND GLASS BONDING ADHESIVE OPERATIONS PLUS ALL COATINGS AND THINNERS, EXCEPT FOR DEADENER MATERIALS AND FOR ADHESIVE AND SEALER MATERIALS NOT COMPONENTS OF GLASS BONDING SYSTEMS, USED IN COATING OPERATIONS.	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND THE BASIS OF DETERMINATION.
SCS-ECOAT	40 CFR Part 63, Subpart IIII	63IIII- SCSECOAT	UNIT TYPE = PROCESS (SURFACE COATING OF AUTOMOBILES AND LIGHT-DUTY TRUCKS) FUNCTIONALLY IDENTICAL REPLACEMENT [REG VII] = UNIT IS NOT FUNCTIONALLY IDENTICAL REPLACEMENT (DATE CONSTRUCTED/PLACED IN SERVICE = '92+') COMBINED ORGANIC HAP EMISSIONS FROM ELECTRODEPOSITION PRIMER, PRIMER-SURFACER, TOPCOAT, FINAL REPAIR, GLASS BONDING PRIMER AND GLASS BONDING ADHESIVE OPERATIONS PLUS ALL COATINGS AND THINNERS, EXCEPT FOR DEADENER MATERIALS AND FOR ADHESIVE AND SEALER MATERIALS NOT COMPONENTS OF GLASS BONDING SYSTEMS, USED IN COATING OPERATIONS.	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND THE BASIS OF DETERMINATION.
SCS-PRIMSURF	40 CFR Part 63, Subpart IIII	63IIII- SCSPRIMS	UNIT TYPE = PROCESS (SURFACE COATING OF AUTOMOBILES AND LIGHT-DUTY TRUCKS) FUNCTIONALLY IDENTICAL REPLACEMENT [REG VII] = UNIT IS NOT FUNCTIONALLY IDENTICAL REPLACEMENT (DATE CONSTRUCTED/PLACED IN SERVICE = '92+') COMBINED ORGANIC HAP EMISSIONS FROM ELECTRODEPOSITION PRIMER, PRIMER-SURFACER, TOPCOAT, FINAL REPAIR, GLASS BONDING PRIMER AND GLASS BONDING ADHESIVE OPERATIONS PLUS ALL COATINGS AND THINNERS, EXCEPT FOR DEADENER MATERIALS AND FOR ADHESIVE AND SEALER MATERIALS NOT COMPONENTS OF GLASS BONDING SYSTEMS, USED IN COATING OPERATIONS.	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND THE BASIS OF DETERMINATION.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
SCS-TOPCOAT	40 CFR Part 63, Subpart IIII	63IIII-TOPCO	UNIT TYPE = PROCESS (SURFACE COATING OF AUTOMOBILES AND LIGHT-DUTY TRUCKS) FUNCTIONALLY IDENTICAL REPLACEMENT [REG VII] = UNIT IS NOT FUNCTIONALLY IDENTICAL REPLACEMENT (DATE CONSTRUCTED/PLACED IN SERVICE = '92+') COMBINED ORGANIC HAP EMISSIONS FROM ELECTRODEPOSITION PRIMER, PRIMER-SURFACER, TOPCOAT, FINAL REPAIR, GLASS BONDING PRIMER AND GLASS BONDING ADHESIVE OPERATIONS PLUS ALL COATINGS AND THINNERS, EXCEPT FOR DEADENER MATERIALS AND FOR ADHESIVE AND SEALER MATERIALS NOT COMPONENTS OF GLASS BONDING SYSTEMS, USED IN COATING OPERATIONS.	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND THE BASIS OF DETERMINATION.
EMERGEN1	40 CFR Part 60, Subpart IIII	601111	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005. Diesel = Diesel fuel is used. Kilowatts = Power rating is greater than or equal to 37 KW and less than 130 KW. Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement. Displacement = Displacement is less than 10 liters per cylinder. Service = CI ICE is an emergency engine. Standards = The emergency CI ICE meets the standards applicable to non-emergency engines. Commencing = CI ICE was newly constructed after 07/11/2005. Compliance Option = Records are being kept of manufacturer data according to §60.4211(b)(3). Manufacture Date = Date of manufacture was after 04/01/2006. Model Year = CI ICE was manufactured prior to model year 2007.	
EMERGEN1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2. Brake HP = Stationary RICE with a brake HP less than 100 HP. Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006. Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
EMERGEN2	40 CFR Part 60, Subpart IIII	601111	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005.	
			Diesel = Diesel fuel is used.	
			Kilowatts = Power rating is greater than or equal to 130 KW and less than or equal to 2237 KW.	
			Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.	
			Displacement = Displacement is less than 10 liters per cylinder.	
			Service = CI ICE is an emergency engine.	
			Standards = The emergency CI ICE meets the standards applicable to non- emergency engines.	
			Commencing = CI ICE was newly constructed after 07/11/2005.	
			Compliance Option = Records are being kept of manufacturer data according to §60.4211(b)(3).	
			Manufacture Date = Date of manufacture was after 04/01/2006.	
			Model Year = CI ICE was manufactured prior to model year 2007.	
EMERGEN2	40 CFR Part 63, Subpart	63ZZZZ	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
	ZZZZ		Brake HP = Stationary RICE with a brake HP greater than 500 HP.	
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.	
			Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).	
EMERGEN3	40 CFR Part 60, Subpart IIII	601111	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005.	
			Diesel = Diesel fuel is used.	
			Kilowatts = Power rating is greater than or equal to 37 KW and less than 130 KW.	
			Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.	
			Displacement = Displacement is less than 10 liters per cylinder.	
			Service = CI ICE is an emergency engine.	
			Standards = The emergency CI ICE meets the standards applicable to non- emergency engines.	
			Commencing = CI ICE was newly constructed after 07/11/2005.	
			Compliance Option = Records are being kept of manufacturer data according to §60.4211(b)(3).	
			Manufacture Date = Date of manufacture was after 04/01/2006.	
			Model Year = CI ICE was manufactured prior to model year 2007.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
EMERGEN3	40 CFR Part 63, Subpart	63ZZZZ	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
	ZZZZ		Brake HP = Stationary RICE with a brake HP greater than or equal to 100 HP and less than 250 HP.	
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.	
			Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).	
EMERGEN6	40 CFR Part 60, Subpart IIII	601111	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005.	
			Diesel = Diesel fuel is used.	
			Kilowatts = Power rating greater than or equal to 130 KW and less than or equal to 368 KW.	
			Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.	
			Displacement = Displacement is less than 10 liters per cylinder.	
			Service = CI ICE is an emergency engine.	
			Standards = The emergency CI ICE meets the standards applicable to non- emergency engines.	
			Commencing = CI ICE was newly constructed after 07/11/2005.	
			Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions.	
			Manufacture Date = Date of manufacture was after 04/01/2006.	
			Model Year = CI ICE was manufactured in model year 2007.	
EMERGEN6	40 CFR Part 63, Subpart	63ZZZZ	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
	ZZZZ		Brake HP = Stationary RICE with a brake HP greater than or equal to 100 HP and less than 250 HP.	
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.	
			Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
EMERGEN7	40 CFR Part 60, Subpart IIII	601111	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005.	
			Diesel = Diesel fuel is used.	
			Kilowatts = Power rating is greater than or equal to 37 KW and less than 130 KW.	
			Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.	
			Displacement = Displacement is less than 10 liters per cylinder.	
			Service = CI ICE is an emergency engine.	
			Standards = The emergency CI ICE meets the standards applicable to non- emergency engines.	
			Commencing = CI ICE was newly constructed after 07/11/2005.	
			Compliance Option = Records are being kept of manufacturer data according to §60.4211(b)(3).	
			Manufacture Date = Date of manufacture was after 04/01/2006.	
			Model Year = CI ICE was manufactured prior to model year 2007.	
EMERGEN7	40 CFR Part 63, Subpart	63ZZZZ	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
	ZZZZ		Brake HP = Stationary RICE with a brake HP less than 100 HP.	
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.	
			Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-EMERFP1	40 CFR Part 60, Subpart IIII	601111	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005.	
			Diesel = Diesel fuel is used.	
			Kilowatts = Power rating is greater than or equal to 130 KW and less than or equal to 368 KW.	
			Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.	
			Displacement = Displacement is less than 10 liters per cylinder.	
			Service = CI ICE is a fire-pump engine, an emergency engine certified to National Fire Protection Association requirements.	
			Standards = The emergency CI ICE meets the standards applicable to non- emergency engines.	
			Commencing = CI ICE was newly constructed after 07/11/2005.	
			Compliance Option = Records are being kept of manufacturer data according to §60.4211(b)(3).	
			Manufacture Date = Date of manufacture was after 07/01/2006.	
			Model Year = CI ICE was manufactured prior to model year 2007.	
GRP-EMERFP1	40 CFR Part 63, Subpart	63ZZZZ	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
	ZZZZ		Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP.	
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.	
			Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).	
GRP-EMERGEN3	40 CFR Part 63, Subpart	63ZZZZ	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.	
	ZZZZ		Brake HP = Stationary RICE with a brake HP greater than or equal to 100 HP and less than 250 HP.	
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.	
			Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**	
GRP-NONEMER1	40 CFR Part 60, Subpart IIII	601111	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005.		
			Diesel = Diesel fuel is used.		
			Kilowatts = Power rating is greater than or equal to 19 KW and less than 37 KW.		
			Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.		
			Filter = The CI ICE is not equipped with a diesel particulate filter.		
			Displacement = Displacement is less than 10 liters per cylinder.		
			Service = CI ICE is a non-emergency engine.		
			Commencing = CI ICE was newly constructed after 07/11/2005.		
			Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions.		
			Generator Set = The CI ICE is a generator set engine.		
			Manufacture Date = Date of manufacture was after 04/01/2006.		
			Model Year = CI ICE was manufactured in model year 2008.		
GRP-NONEMER1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2. Brake HP = Stationary RICE with a brake HP less than 100 HP.		
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.		
			Service Type = Normal use.		
			Stationary RICE Type = Compression ignition engine		
GRP-BMST3	40 CFR Part 63, Subpart EEEE	63EEEE-TRANSFER	ALTERNATE CONTROL REQUIREMENT [REG V] = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND THE BASIS OF DETERMINATION.	
				REG V - STORAGE VESSELS CONSTRUCTION DATE = On or after May 12, 1973	
			30 TAC CHAPTER (REG V) 115 TANK DESCRIPTION = Tank does not require emission controls		
			30 TAC CHAPTER 115 (REG V) PRODUCT STORED = VOC other than crude oil or condensate		
			TRUE VAPOR PRESSURE (TVP) AT STORAGE CONDITIONS [REG V] = True vapor pressure is less than 1.5 psia		
			30 TAC CHAPTER 115 (REG V) STORAGE CAPACITY = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons		
GRP-BMST3	40 CFR Part 63, Subpart	63EEEE-VESSEL	40 CFR 60 (NSPS) SUBPART KB PRODUCT STORED = Volatile organic liquid	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND	
	EEEE		40 CFR 60 (NSPS) SUBPART KB STORAGE CAPACITY = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)	THE BASIS OF DETERMINATION.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
BMST-T505-5	30 TAC	R5112	Construction Date = On or after May 12, 1973	
	Chapter 115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a submerged fill pipe	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
BMST-T505-5	40 CFR Part 60, Subpart Kb	60KB	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)	
GRP-BMST1	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Other than crude oil, condensate, or VOC	
GRP-BMST1	40 CFR Part 60, Subpart Kb	60KB	Product Stored = Stored product other than volatile organic liquid or petroleum liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)	
GRP-BMST2	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = On or after May 12, 1973 Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
GRP-BMST2	40 CFR Part 60, Subpart Kb	60KB	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**	
GRP-BMST3	30 TAC	R5112	Construction Date = On or after May 12, 1973		
	Chapter 115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.		
			Tank Description = Tank does not require emission controls		
			True Vapor Pressure = True vapor pressure is less than 1.5 psia		
			Product Stored = VOC other than crude oil or condensate		
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons		
GRP-BMST3	40 CFR Part	60KB	Product Stored = Volatile organic liquid		
	60, Subpart Kb		Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)		
GASLOAD	30 TAC	R5112	Chapter 115 Facility Type = Motor vehicle fuel dispensing facility		
	Chapter 115, Loading and Unloading of VOC		Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.		
VOCTRANS1	30 TAC	R5211	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline		
	Chapter 115, Loading and Unloading of	Alternate Control Requirement (ACR) = No alternate control requirements a utilized.	Alternate Control Requirement (ACR) = No alternate control requirements are being		
	VOC		Product Transferred = Volatile organic compounds other than liquefied petroleum		
			True Vapor Pressure = True vapor pressure is less than 1.5 psia.		
VOCTRANS2	30 TAC Chapter 115, Loading and	R5211	Chapter 115 Control Device Type = Control device other than a flare, vapor combustor, catalytic incinerator, direct flame incinerator, chiller, or carbon adsorption system.		
	Unloading of VOC			Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
			Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.		
			Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor- tight connections that close automatically when disconnected.		
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.		
			Transfer Type = Only unloading.		
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.		
			Daily Throughput = Loading less than 20,000 gallons per day.		

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-PSBOIL	40 CFR Part 60, Subpart Dc	60DC	Construction/Modification Date = After June 9, 1989 but on or before February 28, 2005. Maximum Design Heat Input Capacity = Maximum design heat input capacity is less than 10 MMBtu/hr (2.9 MW).	
GRP-PSBOIL	40 CFR Part 63, Subpart DDDDD	63DDDDD	Construction/Reconstruction Date = Construction or reconstruction began on or before June 4, 2010. HEAT INPUT CAPACITY = RATED HEAT INPUT CAPACITY OF 10 MMBTU/HR OR LESS FUEL TYPE = NATURAL GAS	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND THE BASIS OF DETERMINATION.
WATERSEP	30 TAC Chapter 115, Water Separation	R5112	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Any single or multiple compartment VOC water separator which separates materials having a TVP less than 1.5 psia (10.3 kPa) obtained from any equipment.	
GRP-DEGREASE	30 TAC Chapter 115, Degreasing Processes	R5412	Solvent Degreasing Machine Type = Cold solvent cleaning machine. Alternate Control Requirement = The TCEQ Executive Director has not approved an alternative control requirement as allowed under 30 TAC § 115.413 or not alternative has been requested. Solvent Sprayed = No solvent is sprayed. Solvent Vapor Pressure = Solvent vapor pressure is less than or equal to 0.6 psia as measured at 100 degrees Fahrenheit. Solvent Heated = The solvent is not heated to a temperature greater than 120° F. Parts Larger than Drainage = No cleaned parts for which the machine is authorized to clean are larger than the internal drainage facility of the machine. Drainage Area = Area is less than 16 square inches. Disposal in Enclosed Containers = Waste solvent is properly disposed of in enclosed containers.	
GRP-PLASPNT	40 CFR Part 63, Subpart PPPP	63PPPP	Quantity of Materials Used = Facility uses greater than 100 gallons. Facility Operations = Surface coating operations other than research, laboratory, maintenance operations, on-site at facilities owned by the Armed Forces or NASA, plastic extrustion coatings, coating of magnet wire or screen printing. Overlap = Meeting § 63.3081(b) and § 63.3082(c) of Title 40 CFR Part 63, Subpart IIII and choosing to comply with Subpart IIII.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-PROCLEAN	40 CFR Part 63, Subpart PPPP	63PPPP	Quantity of Materials Used = Facility uses greater than 100 gallons. Facility Operations = Surface coating operations other than research, laboratory, maintenance operations, on-site at facilities owned by the Armed Forces or NASA, plastic extrustion coatings, coating of magnet wire or screen printing. Overlap = Meeting § 63.3081(b) and § 63.3082(c) of Title 40 CFR Part 63, Subpart IIII and choosing to comply with Subpart IIII.	
GRP-PROCLEAN	40 CFR Part 63, Subpart MMMM	63ММММ	Surface Coating of Miscellaneous Metal Parts = Meets the applicability criteria in §63.3081(b) of the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII). Method of Compliance = Comply with the requirements of subpart IIII of this part in lieu of complying with the Surface Coating of Miscellaneous Metal Parts and Products NESHAP.	THE RULE CITATIONS WERE DETERMINED FROM AN ANALYSIS OF THE RULE TEXT AND THE BASIS OF DETERMINATION.
SCS-ECOAT	40 CFR Part 60, Subpart MM	60MM	Coating Operations = Prime coat operations are carried out. Construction/Modification Date = After October 5, 1979. Plastic Parts Coating = The designated facility does not carry out the coating of plastic body components, coating of all-plastic automobile or light-duty truck bodies on separate coating lines. Prime Coat Application = The plant uses electrostatic deposition for applying prime coat operations. Turnover Ratio = R _t greater than or equal to 0.16. Method of Compliance = A capture system and a control device is used that destroys VOCs with a thermal incinerator.	
SCS-PRIMSURF	40 CFR Part 60, Subpart MM	60MM	Coating Operations = Guide coat operations are carried out. Construction/Modification Date = After October 5, 1979. Plastic Parts Coating = The designated facility does not carry out the coating of plastic body components, coating of all-plastic automobile or light-duty truck bodies on separate coating lines. Method of Compliance = A capture system and a control device is used that destroys VOCs with a thermal incinerator.	
SCS-TOPCOAT	40 CFR Part 60, Subpart MM	60MM	Coating Operations = Top coat operations are carried out. Construction/Modification Date = After October 5, 1979. Plastic Parts Coating = The designated facility does not carry out the coating of plastic body components, coating of all-plastic automobile or light-duty truck bodies on separate coating lines. Method of Compliance = A capture system and a control device is used that destroys VOCs with a thermal incinerator.	

^{* -} The "unit attributes" or operating conditions that determine what requirements apply

** - Notes changes made to the automated results from the DSS, and a brief explanation why

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room,

located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

New Source Review Authorization References

Prevention of Significant Deterioration (PSD) Permits		
PSD Permit No.: PSDTX1036	Issuance Date: 11/22/2016	
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.		
Authorization No.: 70661	Issuance Date: 11/22/2016	
Permits By Rule (30 TAC Chapter 106) for the Application Area		
Number: 106.122	Version No./Date: 09/04/2000	
Number: 106.183	Version No./Date: 09/04/2000	
Number: 106.227	Version No./Date: 09/04/2000	
Number: 106.261	Version No./Date: 11/01/2003	
Number: 106.262	Version No./Date: 11/01/2003	
Number: 106.263	Version No./Date: 09/04/2000	
Number: 106.412	Version No./Date: 09/04/2000	
Number: 106.433	Version No./Date: 09/04/2000	
Number: 106.452	Version No./Date: 09/04/2000	
Number: 106.454	Version No./Date: 11/01/2001	
Number: 106.511	Version No./Date: 09/04/2000	

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has

an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

- 1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
- 2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
- 3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information		
ID No.: SCS-ECOAT		
Control Device ID No.: RTO-A	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)	
Control Device ID No.: RTO-B	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)	
Applicable Regulatory Requirement		
Name: 40 CFR Part 60, Subpart MM	SOP Index No.: 60MM	
Pollutant: VOC	Main Standard: § 60.392(a)(1)(i)	
Monitoring Information		
Indicator: Combustion temperature		
Minimum Frequency: Four times per hour		
Averaging Period: Three hours		
Deviation Limit: For thermal incinerators, every three hour period shall be reported during which the average temperature measured is less than 1517.6 degrees Fahrenheit.		
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Basis of CAM: To achieve the proper destruction efficiency the thermal incinerator must be maintained above a baseline temperature. Operation below the minimum combustion temperature will result in incomplete combustion. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

Unit/Group/Process Information		
ID No.: SCS-PRIMSURF		
Control Device ID No.: RTO-A	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)	
Control Device ID No.: RTO-B	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)	
Applicable Regulatory Requirement		
Name: 40 CFR Part 60, Subpart MM	SOP Index No.: 60MM	
Pollutant: VOC	Main Standard: § 60.392(b)	
Monitoring Information		
Indicator: Combustion temperature		
Minimum Frequency: Four times per hour		
Averaging Period: Three hours		
Deviation Limit: For thermal incinerators, every three hour presented temperature measured is less than 1517.6 degrees Fahrenh		

Basis of CAM: To achieve the proper destruction efficiency the thermal incinerator must be maintained above a baseline temperature. Operation below the minimum combustion temperature will result in incomplete combustion. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

Unit/Group/Process Information		
ID No.: SCS-TOPCOAT		
Control Device ID No.: RTO-A	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)	
Control Device ID No.: RTO-B	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)	
Applicable Regulatory Requirement		
Name: 40 CFR Part 60, Subpart MM	SOP Index No.: 60MM	
Pollutant: VOC	Main Standard: § 60.392(c)	
Monitoring Information		
Indicator: Combustion temperature		
Minimum Frequency: Four times per hour		
Averaging Period: Three hours		
Deviation Limit: For thermal incinerators, every three hour temperature measured is less than 1517.6 degrees Fahren		

Basis of CAM: To achieve the proper destruction efficiency the thermal incinerator must be maintained above a baseline temperature. Operation below the minimum combustion temperature will result in incomplete combustion. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63,

Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

Periodic Monitoring:

1999) to monitor VOC sources.

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information		
ID No.: BMST-T505-5		
Control Device ID No.: N/A	Control Device Type: N/A	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112	
Pollutant: VOC	Main Standard: § 115.112(c)(1)	
Monitoring Information		
Indicator: Structural Integrity of the Pipe		
Minimum Frequency: Emptied and degassed		
Averaging Period: n/a		
Deviation Limit: Fill pipe not integral and not repaired	before refill.	
Basis of monitoring:		

The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April

Unit/Group/Process Information		
ID No.: BMST-T505-5		
Control Device ID No.: N/A	Control Device Type: N/A	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112	
Pollutant: VOC	Main Standard: § 115.112(c)(1)	
Monitoring Information		
Indicator: Liquid Level		
Minimum Frequency: At the end of each unloading or	peration	

Averaging Period: n/a

Deviation Limit: Fill pipe not submerged in liquid.

Basis of monitoring:

The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.

Unit/Group/Process Information	
ID No.: GRP-DEGREASE	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Degreasing Processes	SOP Index No.: R5412
Pollutant: VOC	Main Standard: § 115.412(1)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: Monthly	
Averaging Period: n/a	
Deviation Limit: Cover not closed when not in use.	

Basis of monitoring:

The monitoring option to cover cold cleaner or the open-top vapor cleaner was included in the EPA "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources. In addition to covering the cleaner records of monthly inspections of equipment is an effective way to ensure that the system is operating in accordance with its design.

Compliance Review	
1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on <u>June 26, 2017.</u>	
Site rating: 0.17 / Satisfactory Company rating: 0.17 / Satisfactory	
(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)	
2. Has the permit changed on the basis of the compliance history or site/company rating?	No
Site/Permit Area Compliance Status Review	
1. Were there any out-of-compliance units listed on Form OP-ACPS?	No
2. Is a compliance plan and schedule included in the permit?	No
Available Unit Attribute Forms	
OP-UA1 - Miscellaneous and Generic Unit Attributes	
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes	
OP-UA3 - Storage Tank/Vessel Attributes	
OP-UA4 - Loading/Unloading Operations Attributes	
OP-UA5 - Process Heater/Furnace Attributes	
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes OP-UA7 - Flare Attributes	
OP-UA8 - Coal Preparation Plant Attributes	
OP-UA9 - Nonmetallic Mineral Process Plant Attributes	
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes	
OP-UA11 - Stationary Turbine Attributes	
OP-UA12 - Fugitive Emission Unit Attributes	
OP-UA13 - Industrial Process Cooling Tower Attributes	
OP-UA14 - Water Separator Attributes	
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes	
OP-UA16 - Solvent Degreasing Machine Attributes	
OP-UA17 - Distillation Unit Attributes	
OP-UA18 - Surface Coating Operations Attributes	
OP-UA19 - Wastewater Unit Attributes	
OP-UA20 - Asphalt Operations Attributes	
OP-UA21 - Grain Elevator Attributes	
OP-UA22 - Printing Attributes OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes	
OP-UA25 - Synthetic Fiber Production Attributes	
OP-UA26 - Electroplating and Anodizing Unit Attributes	
OP-UA27 - Nitric Acid Manufacturing Attributes	
OP-UA28 - Polymer Manufacturing Attributes	
OP-UA29 - Glass Manufacturing Unit Attributes	
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes	
OP-UA31 - Lead Smelting Attributes	
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes	
OP-UA33 - Metallic Mineral Processing Plant Attributes	
OP-UA34 - Pharmaceutical Manufacturing	
OP-UA35 - Incinerator Attributes	
OP-UA36 - Steel Plant Unit Attributes	
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes	
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes OP-UA39 - Sterilization Source Attributes	
OP-UA40 - Ferroalloy Production Facility Attributes	
OP-UA41 - Dry Cleaning Facility Attributes	
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes	
OP-UA43 - Sulfuric Acid Production Attributes	
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes	
OP-UA45 - Surface Impoundment Attributes	
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes	

- OP-UA47 Ship Building and Ship Repair Unit Attributes
- OP-UA48 Air Oxidation Unit Process Attributes
- OP-UA49 Vacuum-Producing System Attributes
- OP-UA50 Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
- OP-UA51 Dryer/Kiln/Oven Attributes
- OP-UA52 Closed Vent Systems and Control Devices
- OP-UA53 Beryllium Processing Attributes
- OP-UA54 Mercury Chlor-Alkali Cell Attributes
- OP-UA55 Transfer System Attributes
- OP-UA56 Vinyl Chloride Process Attributes
- OP-UA57 Cleaning/Depainting Operation Attributes
- **OP-UA58 Treatment Process Attributes**
- OP-UA59 Coke By-Product Recovery Plant Attributes
- OP-UA60 Chemical Manufacturing Process Unit Attributes
- OP-UA61 Pulp, Paper, or Paperboard Producing Process Attributes
- OP-UA62 Glycol Dehydration Unit Attributes
- OP-UA63 Vegetable Oil Production Attributes